

This draft is a working document. All information contained herein is subject to change and may differ substantially from the final document. The information contained in this document should not be considered the position or views of ADEQ or the Governor.

#### Reasons for the Arkansas challenge to the Regional Haze FIP

- Arkansas is both under the Uniform Rate of Progress for the first planning period and has already exceeded the Reasonable Progress Goals in the FIP.
  - Nevertheless, the FIP included controls on Entergy's Independence Plant cost in excess of one billion dollars purportedly to achieve reasonable progress.
- EPA required 18 month compliance date for installation of certain controls without any basis in the record for doing so.
- The outages required for installation of low NOx burners on White Bluff and Independence could take a significant percentage of the state's electricity generating capacity offline, which could endanger grid reliability in the state.
- EPA relied on less refined CALPUFF modeling in support of the Arkansas FIP rather than more sophisticated CAMx modeling, which was relied upon in the Texas FIP.
- EPA did not allow Arkansas EGUs to rely on the Cross-State Air Pollution Rule as a compliance mechanism for NOx despite doing so in other states including Texas.
- The first planning period ends in 2018, and many of the SO2 controls purportedly needed to address visibility conditions will not be installed until well after the end of the first planning period.
- The total impact of the FIP in the first planning period is .0082 deciviews in Caney Creek and .00742 deciviews in Upper Buffalo. Changes in visibility less than one deciview are not visible to the naked eye.

#### RH Planning Period 1 strategy

ARKANSAS SIPs TIMELINE*	
Regional Haze	
Concurrent CAO and SIP process	
Research and draft initial language, Ark Code Ann 8-4-317 analysis, CAOs, and meeting with stakeholders	September 2015–May 2017
Routing of Draft SIP Package and CAOs	May 1–May 30, 2017
Consultation with Federal Land Managers	Concurrent with Routing and Public Notice, Must begin 60 days before the public hearing
Comment Period for CAOs and SIP (simultaneously): Public Notice/Hearing	PH: June 29, 2017 Comment period: May 31–July 14, 2017
Response to Comments and Finalizing SIP Package	July 14, 2017–August 14, 2017
Routing SIP Packet	August 14, 2017–August 31, 2017

This draft is a working document. All information contained herein is subject to change and may differ substantially from the final document. The information contained in this document should not be considered the position or views of ADEQ or the Governor.

Submit SIP for Governor's Signature	August 31, 2017
Submit SIP to EPA	September 7, 2017

What we have:

- Framework for SIP Package (including cover pages and placeholders)
- Draft Governor's Letter
- Introduction
  - Overview of what we intend to address in this SIP revision
  - SIP Components Included in this SIP Revision
    - List of CAOs, including reference number, need to be added
  - Background from the promulgation of the 1977 amendments to the Court's abeyance of the Petition for Review of the Arkansas Regional Haze FIP on March 8, There is a placeholder for further developments
  - Revisions to BART-eligible sources list and explanation of why we are not changing the subject-to-BART list.
  - Revisions to BART determinations
    - Currently in the process of drafting summaries for Lake Catherine, Flint Creek, McClellan, and Bailey
    - BART analyses will be included in appendices
  - Reasonable Progress Analysis
    - Identification of key pollutants and source categories
    - Identification of potential reasonable progress sources for first planning period
    - Four factor of analysis for Entergy Independence (needs updating with Entergy specific data on costs and emission reduction potential)
    - RPG Goals: Adopting EPA RPGs included in FIP because we can reach them even though compliance with BART requirements (except CSAPR and possibly low sulfur coal) will not begin during first planning period
  - Revisions to Long-Term Strategy (Emission limitations, schedule of compliance, and enforceability of emission limitation elements only).
  - Appendices
    - 5-factor analysis for Bailey and McClellan
    - 5-factor analysis for Flint Creek
    - 5-factor analysis for Lake Catherine
- Legal authority to implement the plan

What we need (who needs to develop it):

This draft is a working document. All information contained herein is subject to change and may differ substantially from the final document. The information contained in this document should not be considered the position or views of ADEQ or the Governor.

- CAOs for Flint Creek, White Bluff and Lake Catherine, Domtar, McClellan, Bailey (staff with concurrence of subject sources)
- Updated 5-factor analysis for White Bluff (including low sulfur coal, any revisions necessary to closing dates, or lack thereof, needed to justify not installing scrubbers, etc.) **(needed from Entergy)**
- Updated 5-factor analysis for Domtar supporting determinations in CAO **(needed from Domtar)**
- Independence-specific information to tweak RPG analysis completed by staff **(needed from Entergy)**
- 8-4-317 analysis (staff).
- Public notice for CAOs and SIP (staff)
- Reservation for public hearing (staff)

#### Immediate Next Steps:

- Request needed documentation from Entergy and Domtar to be delivered by a date conforming with our timelines
- Finalize SIP draft, draft CAOs, and public notice docs
- Send draft to FLMs when we start routing (provide caveat that this is a draft document; however, we do not anticipate substantive changes to requirements as a result of our internal routing process)
- 30 days after draft sent to FLMs, begin public notice

#### Revisions included:

- Revisions to BART
  - SO<sub>2</sub> controls
    - Flint Creek, Carl E. Baily, and McClellan: BART controls match FIP
    - Lake Catherine: Use of natural gas fuel (matches FIP)
    - White Bluff: BART is low sulfur coal due to remaining useful life of units
  - NO<sub>x</sub> controls: Participation in CSAPR for ozone-season NO<sub>x</sub>
  - PM controls: Existing particulate matter emission limits in permits (matches FIP)
- Revisions to Reasonable Progress
  - No controls beyond BART is reasonable based on a revised four-factor analysis
  - Arkansas is already meeting reasonable progress goals established in the FIP
- Revisions to Compliance Deadlines

This draft is a working document. All information contained herein is subject to change and may differ substantially from the final document. The information contained in this document should not be considered the position or views of ADEQ or the Governor.

- As expeditiously as practicable, but in no event later than five years after EPA approves the Arkansas Regional Haze State Implementation Plan
- Revisions to Long-Term Strategy
  - Incorporates revised emission limits, compliance schedules, and enforcement mechanism

DRAFT